

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff,

-against-

IV MEDIA, LLC; FAMJAMS TRADING
LLC; and DOES 1-10,

Defendants.

Civil Action No. 25-cv-03563-LAP

ANSWER

Defendant Famjams Trading LLC ("Famjams"), by its attorneys The Silber Law Firm, LLC, for its Answer to the Complaint, states and alleges as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint.
2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint except to deny those allegations to the extent that wrongdoing is alleged against Famjams.
3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Complaint except states that the claims speak for themselves.
4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint.
5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.
6. Admits the truth of the allegations contained in paragraph 6 of the Complaint.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint.

15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint.

16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the Complaint.

17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Complaint.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint.

19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint.

20. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint.

21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint.

22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the Complaint.

23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the Complaint.

24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint.

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint except denies any wrongdoing.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint.

28. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint.

29. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint.

30. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint.

32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint.

33. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint.

34. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint.

35. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Complaint except denies any wrongdoing.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint except believes that it received a letter from plaintiff's counsel.

37. Admits the truth of the allegations contained in paragraph 37 of the Complaint.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Complaint except admits that discussions among counsel took place but denies that the negotiations and cooperation were lacking and states further that to the extent a resolution was not reached between plaintiff and Famjams such failure was not the fault of Famjams.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint except denies any wrongdoing.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint except denies any wrongdoing.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPOSE TO THE FIRST CAUSE OF ACTION

43. Famjams restates all of the foregoing.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint except denies any wrongdoing.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint except denies any wrongdoing.

47. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint except denies any wrongdoing.

48. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint except denies any wrongdoing.

49. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPOSE TO THE SECOND CAUSE OF ACTION

51. Famjams restates all of the foregoing.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint except denies any wrongdoing.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint except denies any wrongdoing.

55. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint except denies any wrongdoing.

56. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint except denies any wrongdoing.

57. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

58. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPONSE TO THE THIRD CAUSE OF ACTION

59. Famjams restates all of the foregoing.

60. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint except denies any wrongdoing.

61. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint except denies any wrongdoing.

62. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint except denies any wrongdoing.

63. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

64. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPONSE TO THE FOURTH CAUSE OF ACTION

65. Famjams restates all of the foregoing.

66. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the Complaint except denies any wrongdoing.

67. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Complaint except denies any wrongdoing.

68. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint except denies any wrongdoing.

69. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

70. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPONSE TO THE FIFTH CAUSE OF ACTION

71. Famjams restates all of the foregoing.

72. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint.

73. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint.

74. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Complaint except denies any wrongdoing.

75. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint except denies any wrongdoing.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Complaint except denies any wrongdoing.

77. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

78. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPONSE TO THE SIXTH CAUSE OF ACTION

79. Famjams restates all of the foregoing.

80. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint.

81. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint except denies any wrongdoing.

82. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint except denies any wrongdoing.

83. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint except denies any wrongdoing.

84. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

85. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AS AND FOR A REPONSE TO THE SEVENTH CAUSE OF ACTION

86. Famjams restates all of the foregoing.

87. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Complaint.

88. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint except denies any wrongdoing.

89. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint except denies any wrongdoing.

90. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint except denies any wrongdoing.

91. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91 of the Complaint except denies any wrongdoing.

92. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

93. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of the Complaint except denies any wrongdoing or that it caused plaintiff any harm, or that plaintiff is entitled to any relief.

AFFIRMATIVE DEFENSES

94. The Complaint fails to state a claim for which relief may be granted.
95. The Complaint engages in “group pleading” and should be dismissed.
96. Plaintiff fails to demonstrate how or that the subject goods are in any way infringing.
97. Plaintiff’s claims are barred by laches.
98. Plaintiff’s actions are barred by bad faith.
99. Plaintiff’s claims are barred by documentary evidence.
100. Whatever wrongdoing is alleged to have been done by Famjams was the fault of third-parties over whom Famjams had no control.
101. Famjams reasonably relied on third-parties.
102. The Complaint fails to name necessary parties.

PRAYER FOR RELIEF

Defendant Famjams Trading LLC demand judgment against plaintiff dismissing the claims and causes of action in plaintiff's Complaint and for such other and further relief for as this Court deems just and proper.

Dated: June 25, 2025

THE SILBER LAW FIRM, LLC

By 
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